

Exhibit 3

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- BENJAMIN WILSON -

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
----- X
ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655(LGS)(GWG)

v.

GOOGLE LLC,

Defendant.

----- X

DATE: December 2, 2020

TIME: 10:21 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF BENJAMIN WILSON, held via Zoom, pursuant to
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

12/02/2020

30 to 33

<p style="text-align: right;">Page 30</p> <p>1 - BENJAMIN WILSON -</p> <p>2 GE Oil & Gas; is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. And in what role did you join GE</p> <p>5 Oil & Gas?</p> <p>6 A. Chief Technology Officer.</p> <p>7 Q. Were you the sole Chief Technology</p> <p>8 Officer of GE Oil & Gas or were there other Chief</p> <p>9 Technology Officers as well?</p> <p>10 A. I was Chief Technology Officer. I</p> <p>11 had people who used that the term -- the --</p> <p>12 the -- the word Chief Technology Officer of like</p> <p>13 operations and so forth who worked for me.</p> <p>14 Q. And to whom did you report?</p> <p>15 A. I reported to the CIO.</p> <p>16 Q. And how large was the team you</p> <p>17 managed?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Contractors and employees, more than</p> <p>20 1,000.</p> <p>21 Q. Do you know how many employees?</p> <p>22 A. More than 500. I -- I -- I would</p> <p>23 have to go look at notes to know the exact number.</p> <p>24 Q. And at the time you were working for</p> <p>25 GE, was the technology Cloud-based?</p>	<p style="text-align: right;">Page 32</p> <p>1 - BENJAMIN WILSON -</p> <p>2 THE WITNESS: I'm sorry, Ken,</p> <p>3 I'm -- I'm -- I'm unclear on how to answer</p> <p>4 this question.</p> <p>5 MR. GAGE: If you don't understand</p> <p>6 the question, that's all you need to say.</p> <p>7 A. I --</p> <p>8 Q. I can reframe.</p> <p>9 A. I'm not trying to be difficult. I</p> <p>10 apologize. It's --</p> <p>11 Q. Sure.</p> <p>12 A. -- this is not a question that you</p> <p>13 can answer in a yes or no.</p> <p>14 Q. Were there still aspects of GE</p> <p>15 Oil & Gas that were data-center based?</p> <p>16 A. Yes.</p> <p>17 MR. GAGE: Objection.</p> <p>18 Q. Did you work with an -- a company</p> <p>19 outside of GE with respect to Cloud-based hosting</p> <p>20 or services?</p> <p>21 A. Yes.</p> <p>22 Q. And what company did you work with?</p> <p>23 A. Pardon me. As it says in the resume</p> <p>24 in the first line, "Amazon Web Services."</p> <p>25 And -- and, I'm sorry, there were</p>
<p style="text-align: right;">Page 31</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. No.</p> <p>3 Q. In any of the roles that you had held</p> <p>4 prior to Google, in any of those roles was the</p> <p>5 technology Cloud-based?</p> <p>6 A. So at GE, I brought GE to the Cloud.</p> <p>7 So we were not Cloud-based when we started; we</p> <p>8 were when we -- we were done.</p> <p>9 Q. And --</p> <p>10 A. Same thing as PQ; they were not</p> <p>11 Cloud-based, but I brought them to be -- I'll</p> <p>12 repeat the entire answer again for clarity.</p> <p>13 At GE, they were not Cloud-based;</p> <p>14 they were data-center based. I brought them to</p> <p>15 Cloud, that was my job. When I moved to P2 Energy</p> <p>16 Solutions, they were also data-center based and I</p> <p>17 moved them to Cloud.</p> <p>18 Q. Did you complete the transformation</p> <p>19 from data center to Cloud while at GE?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Define "complete."</p> <p>22 Q. Was it the -- the move from data</p> <p>23 center to Cloud, was that completed, finished or</p> <p>24 was it still underway when you left?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 33</p> <p>1 - BENJAMIN WILSON -</p> <p>2 multiple companies I worked with. You asked what</p> <p>3 companies, there were multiple. I don't know all</p> <p>4 the names, but the provider Cloud was AWS.</p> <p>5 Q. Okay. Prior to working for Google</p> <p>6 Cloud, had you worked with Google Cloud in any of</p> <p>7 your prior positions?</p> <p>8 A. Well, that would be impossible since</p> <p>9 Google Cloud didn't really exist until -- I -- I</p> <p>10 don't know what year that entity actually existed,</p> <p>11 so that would be hard for me to answer.</p> <p>12 Q. So, again, just so we have a clear</p> <p>13 record: Is the answer that no, you hadn't worked</p> <p>14 with Google Cloud prior to joining Google Cloud?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. Yes, that is correct.</p> <p>17 Q. Okay. You can put that document</p> <p>18 aside.</p> <p>19 A. Done.</p> <p>20 Q. With respect to your position at GE,</p> <p>21 do you recall what your total annual compensation</p> <p>22 was in the last full year you worked for the</p> <p>23 company?</p> <p>24 A. No.</p> <p>25 Q. Do you recall whether it was more</p>